

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------------|---|--------------------------------|
| BACKSTOP SOLUTIONS GROUP, LLC, |) | |
| |) | |
| Plaintiff, |) | |
| vs. |) | Case No: 1:20-cv-07018 |
| |) | |
| DYNAMO SOFTWARE, INC. AND, |) | Honorable Harry D. Leinenweber |
| CHRISTOPHER FULLER, |) | |
| |) | |
| Defendants. |) | |

**MOTION FOR LEAVE TO FILE ANSWER AND AFFIRMATIVE DEFENSES TO
FIRST AMENDED COMPLAINT UNDER SEAL**

Defendant Dynamo Software, Inc. moves under Local Rules 5.8 & 26.2 for leave to file portions of its Answer and Affirmative Defenses to First Amended Complaint under seal, and in support thereof states:

On November 25, 2020, Plaintiff Backstop Solutions Group, LLC (“Plaintiff”) filed this lawsuit, against Defendants Dynamo Software, Inc. (“Dynamo”) and Christopher Fuller (“Fuller”) (collectively “Defendants”). Plaintiff simultaneously filed a Motion for Leave to File Complaint under Seal Pursuant to Local Rules 5.8 and 26.2 [Dkt. No. 5], which the Court granted [Dkt. No. 6]. The Court similarly granted Plaintiff leave to file its First Amended Complaint under Seal [Dkt. No. 28], which it did [Dkt. No. 29].

Under Local Rule 26.2, the “[C]ourt may for good cause shown enter an order directing that one or more documents be filed under seal.” N.D. Ill. LR 26.2(b). The Answer and Affirmative Defenses to First Amended Complaint contains the same redactions as Plaintiff applied to its First Amended Complaint. [See Dkt. No. 29.] Good cause exists to file the Answer and Affirmative Defenses To First Amended Complaint under seal to effectuate the prior order of this Court granting Plaintiff leave to file its First Amended Complaint under seal.

Contemporaneous with the filing of this Motion, Dynamo has provisionally filed the Answer and Affirmative Defenses to First Amended Complaint under seal and electronically filed a redacted public-record version of the same. *See* N.D. Ill. LR 26.2(c).

WHEREFORE, Defendant Dynamo Software, Inc. respectfully requests this Court enter an order granting it leave to file its Answer and Affirmative Defenses to First Amended Complaint under seal and granting such additional relief as it deems just and proper.

Dated: July 26, 2021

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that she filed and served the foregoing document on July 26, 2021, via the Court's CM/ECF system, which will send notice of the filing to all counsel of record. Parties may access the filing through the Court's CM/ECF system.

/s/ Maria A. Boelen